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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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: Chapter 11

RUDOLPH W. GIULIANI

In re:

_ . _ ...

Case No. 23-12055 (SHL)

a/k/a RUDOLPH WILLIAM GIULIANI,

Debtor.

NOTICE OF FILING OF REVISED PROPOSED ORDER REGARDING DEBTOR'S APPLICATION FOR AN ORDER EXTENDING DEBTOR'S EXCLUSIVE PERIODS DURING WHICH DEBTOR MAY FILE A PLAN AND SOLICIT ACCEPTANCES THEREOF PURSUANT TO 11 U.S.C. § 1121

PLEASE TAKE NOTICE that on March 11, 2024, the above-captioned debtor (the "Debtor") filed the Debtor's Application for an Order Extending Debtor's Exclusive Periods During Which Debtor May File a Plan and Solicit Acceptances Thereof Pursuant to 11 U.S.C. § 1121 [Docket No. 142] (the "Application"). Attached to the Application was a proposed form of order extending the exclusive period during which the Debtor may file a plan and solicit acceptances thereof (the "Original Proposed Order").

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PLEASE TAKE FURTHER NOTICE that following discussions with the Official Committee of Unsecured Creditors appointed in the Debtor's chapter 11 case, the Debtor has revised the Original Proposed Order (such revised form of order, the "Revised Proposed Order"), a copy of which is attached hereto as **Exhibit A**. A redline of the Revised Proposed Order marked against the Original Proposed Order is attached hereto as **Exhibit B**.

<u>PLEASE TAKE FURTHER NOTICE</u> that the Debtor's counsel will present the Revised Proposed Order to the Court at the hearing to be held on **Thursday**, April 4, 2024 at 2:00 p.m. (prevailing Easten Time).

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PLEASE TAKE FURTHER NOTICE that copies of the Application and the Revised Proposed Order may be obtained by visiting the Court's website at http://www.nysb.uscourts.gov in accordance with the procedures and fees set forth therein.

Dated: April 3, 2024

/s/ Heath S. Berger

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Attorneys for the Debtor

Dated: April 3, 2024

New York, New York

By: /s/ Philip Dublin

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